

UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA

AGENCY INSURANCE COMPANY OF
MARYLAND,

Plaintiff,

v.

PLACIDA PAULINO and IDALIS
PAULINO,

Defendants.

CIVIL ACTION NO. 3:21-cv-00767-
MEM

**JOINT STIPULATION FOR EXTENSION
OF TIME TO RESPOND TO PLAINTIFF'S COMPLAINT**

IT IS HEREBY STIPULATED by and between the parties hereto that DEFENDANTS PLACIDA PAULINO AND IDALIS PAULINO may have additional time within which to answer or otherwise respond to Plaintiff's complaint. Therefore, the last day for defendants to answer or otherwise respond to plaintiff's complaint will be Wednesday, July 28, 2021.

Good cause exists for this extension as the parties are discussing the possibility of a negotiated resolution. Additionally, defendants are currently appearing pro se and would like time to secure defense counsel. Plaintiff's counsel has agreed to this extension. This is the first request for an extension.

Dated: June 28, 2021

DEFENDANTS By: <u>s/ Placida Paulino</u> Placida Paulino By: <u>s/ Idalis Paulino</u> Idalis Paulino	COUNSEL FOR PLAINTIFF POST & SCHELL, P.C. By: <u>/s Kevin T. McGarry</u> Kevin T. McGarry, Esquire I.D. #: PA313204 1869 Charter Lane P.O. Box 10248 Lancaster, PA 17605-0248 (717) 291-4532 (717) 291-1609 – Fax kmcgarry@postschell.com
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ORDER

Pursuant to the parties' stipulation, IT IS SO ORDERED that Defendant should answer or otherwise respond to Plaintiff's complaint on or before Wednesday, July 28, 2021.

Dated: _____

THE HONORABLE MALACHY E. MANNION,
UNITED STATES DISTRICT COURT

CERTIFICATE OF SERVICE

I, Kevin T. McGarry, Esquire do hereby certify that I caused a true and correct copy of the foregoing document(s) to be served upon the following person(s) at the following address(es) by sending same via Electronic Service (same is available for viewing and downloading from the ECF system):

Placida Paulino
201 Maple Lane
East Stroudsburg, PA 18302
Via U.S. First Class Mail

Idalis Paulino
201 Maple Lane
East Stroudsburg, PA 18302
Via U.S. First Class Mail

POST & SCHELL, P.C.

By: s/ Kevin T. McGarry
Attorney for Plaintiff
Kevin T. McGarry, Esquire
I.D. #: PA313204

DATE: June 28, 2021